

March 26, 2014

VIA E-MAIL (RMD.ODI@dot.gov)

Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
NVS-210; Rm W45-302
Washington, DC 20590

Re: Part 573 Report

Dear Mr. Borris:

Baby Trend, Inc. ("the Company") submits this letter pursuant to 49 C.F.R. Part 573, to provide information relating to NHTSA's concern of a potential safety-related defect identified in AmSafe toddler buckles. Such buckles are similar to certain QT buckles made by AmSafe for use on child restraint systems. To date, the Company has not experienced similar complain patterns. However, in an abundance of caution, and in collaboration and cooperation with NHTSA the Company agreed to submit this 573 Report. The Company has ceased distribution of the limited number of units using the AmSafe QT buckle and will engage in a voluntary recall of the subject buckle upon availability of suitable replacement buckles.

49 C.F.R. § 573.6(c)(1): Manufacturer's name

The buckle at issue was fabricated by AmSafe Commercial products, Inc., 22937 Gallatin Way, Elkhart, IN 46514. They were installed by the Company on a limited number of child restraints and sold under the *TrendZ Fastback* by Baby Trend brand.

49 C.F.R. § 573.6(c)(2): Items of equipment

NHTSA determined through its own investigation that Signature, QT harness buckles ("subject buckles") on certain Graco model years 2009-2013 child restraints, when engaged, may not easily unlatch. While the seats manufactured by the Company may not have used the same production lot of buckles alleged to have been involved with the Graco seat recalls, the same AmSafe buckle model is involved.



The AmSafe QT, similar to the subject buckle, was used on a limited number of the *TrendZ Fastback* by Baby Trend child restraints for model years: 2011-2012 ("subject child restraint"). These seats were produced 10/2011-7/2013 and can be identified as follows:



TrendZ Fastback 3-in-1 Car Seat, Models: FB60070 and FB60408, Fashions: Granite and Jellybean.

49 C.F.R. § 573.6(c)(3): Total Number

The total number of Subject Child Restraints produced is 16,655; the total number sold is 15,355

49 C.F.R. § 573.6(c)(4): Percentage of Affected Equipment

To date based on the Company's data; none of the Subject Child Restraints have been confirmed to have exhibited buckles being stuck in a latched position. Following the announcement of the Graco recall we have received a similar consumer complaint which has not yet to be confirmed. Baby Trend will continue to closely monitor and review its consumer data accordingly.

49 C.F.R. § 573.6(c)(5): Description

As reported by Graco, certain subject buckles that become contaminated with foreign material, such as food or dried liquids, that are not cleaned and maintained per the instruction manual may become progressively difficult to unlatch or become stuck in the latched position. If this occurs, users may experience difficulty unlatching the buckle if not cleaned. While the Company is not aware of a similar pattern of complaint or use involving the Subject Child Restraints it distributed upon confirmation that similar QT buckles were used on a small number of its CRS, the Company has initiated this reporting and action.

49 C.F.R. § 573.6(c)(6): Chronology

The Company has been monitoring the performance of the buckles on the Subject Child Restraint since the announcement by Graco. In an abundance of caution the Company also stopped shipping the Subject Child Restraint pending further investigation. While the Company has not experienced the same nature or severity of complaints related to the use of the Subject Child Restraints, in an abundance of caution the Company submits this 573 Report.



49 C.F.R. § 573.6(c)(8): Manufacturer's Program for Remedy

The Company, in an abundance of caution, has agreed to submit this 573 Report and engage in a voluntary recall to replace buckles for the Subject Child Restraints as soon as a suitable replacement buckle is available.

* * *

The Company will submit any addition information required by Part 573 as it becomes available. If you have any questions, please do not hesitate to contact me directly at 909-472-2369 or bradley@babytrend.com. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Mattarocci".

Brad Mattarocci
General Manager
Baby Trend, Inc.

cc: Denny Tsai, President, Baby Trend, Inc.
Rick Locker, Esq.